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A Member of the
Constellation Energy Group

November 30, 1999

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Response to NRC Generic Letter 99-02, "Laboratory Testing Of Nuclear-Grade Activated Charcoal"

REFERENCE: (a) Letter from Mr. C. H. Cruse (BGE) to NRC Document Control Desk, dated November 22, 1999, "License Amendment Request: Revision to Ventilation Filter Testing Program Technical Specification per Generic Letter 99-02"

Generic Letter 99-02 expressed a concern about testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon." The concern is that available laboratory test results demonstrate that existing test protocols other than ASTM D3803-1989 do not provide sufficiently accurate and reproducible test results and may overestimate the capability of the charcoal. Generic Letter 99-02 requests information that will enable the NRC staff to make a determination that licensees are testing the nuclear-grade activated charcoal of engineered safety feature (ESF) ventilation systems in accordance with a suitable testing standard to ensure that the charcoal filters are capable of performing their required safety function, and that the licensing bases of our facility regarding onsite and offsite dose consequences continue to be satisfied. Specifically, Generic Letter 99-02 communicates the following information request.

Requested Action

Paragraph 1

Within 180 days of the date of this generic letter, submit a written response to the NRC describing your current TS [Technical Specification] requirements for the laboratory testing of charcoal samples for each ESF ventilation system including the specific test protocol, temperature, RH, charcoal bed thickness, total residence time per bed depth, and penetration at which the TS require the test to be performed. If your current TS specifically require laboratory testing of charcoal samples in accordance with the ASTM D3803-1989 protocol at 30 °C [86 °F], and you have been testing in accordance with this standard,

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then you only need to address this requested action (i.e., no TS amendment or additional testing is required).

BGE Response

Our current TS list five ESF ventilation systems for which laboratory testing of a sample of the charcoal adsorber is required. The five ESF ventilation systems listed in the TS are: (1) Control Room Emergency Ventilation System (CREVS); (2) Emergency Core Cooling System (ECCS) Pump Room Exhaust Filtration System (PREFS); (3) Penetration Room Exhaust Ventilation System (PREVS); (4) Spent Fuel Pool Exhaust Ventilation System (SFPEVS); and (5) Iodine Removal System (IRS). Currently, our TS state:

Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, shows the methyl iodide (elemental iodine for the IRS) penetration less than or equal to the value specified below when tested in accordance with ANSI N510-1975 and the testing protocol of ANSI D3803-1989 at a temperature of less than or equal to 30°C (130°C for the IRS) and greater than or equal to the relative humidity specified as follows:

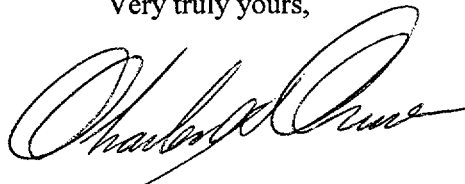
<u>ESF Ventilation System</u>	<u>Penetrations</u>	<u>RH</u>
CREVS	10%	95%
ECCS PREFS	10%	95%
PREVS	10%	95%
SFP Ventilation System	10%	95%
IRS	5%	95%

The charcoal beds in the ESF ventilation systems are approximately 2 inches thick (deep). The total residence time per bed depth is 0.25 seconds.

Baltimore Gas and Electric Company submitted a TS amendment request per Generic Letter 99-02 on November 22, 1999 (Reference a). Generic Letter 99-02 provided a sample TS that the NRC considers acceptable. The proposed revision to our TS meets the intent of the sample TS.

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



CHC/TWG/dlm

cc: R. S. Fleishman, Esquire
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